

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GENERAL MOTORS CORPORATION and	:	
ADAM OPEL GmbH;	:	
	:	
Plaintiffs,	:	<u>NOTICE OF MOTION</u>
	:	
- against -	:	No. 08-CV-4999 (DAB)
	:	
FIAT S.p.A; FIAT AUTO HOLDING B.V.; and	:	
FIAT AUTO S.p.A.,	:	
	:	
Defendants.	:	
-----	x	

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Stay or Dismiss this Action, filed on July 23, 2008, and the Affidavits of John L. Hardiman and Paolo Bottini, sworn to July 22, 2008, including the exhibits attached thereto, Defendants will move this Court, before the Honorable Deborah A. Batts, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, at a time and place to be determined by the Court, for an Order

(a) staying or dismissing this action pursuant to the Federal Arbitration Act and Rule 12(b)(6) of the Federal Rules of Civil Procedure; or

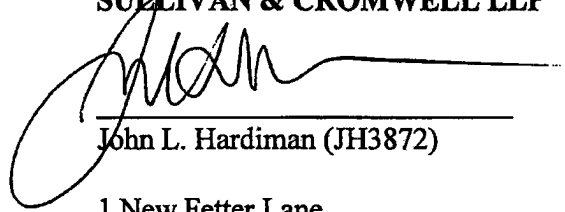
(b) in the alternative, dismissing Plaintiffs' Complaint in its entirety pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure; and

(c) granting such other and further relief as the Court deems just and proper.

Dated: July 23, 2008

Respectfully submitted,

SULLIVAN & CROMWELL LLP

A handwritten signature in black ink, appearing to read 'John L. Hardiman', is written over a horizontal line. The signature is fluid and cursive, with a large loop at the beginning.

John L. Hardiman (JH3872)

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Attorneys for the Defendants
Fiat S.p.A., Fiat Auto Holding B.V.,
and Fiat Auto S.p.A.

KEIR JAMES-LITTLE
Notary Public, State of New York
No. 01JA6156001
Qualified in Bronx County
Certificate Filed in New York County
Commission Expires Nov. 20, 2010